

JESSE EDWARD WILES : NO. 21-82 EQUITY
Route 1 :
Woodsboro, Maryland : IN THE CIRCUIT COURT FOR

COMPLAINANT : FREDERICK COUNTY, IN EQUITY

vs. :

RUTH ELIZABETH WILES :
Route 1 :
Thurmont, Maryland :

DEFENDANT :

* * * * *
MOTION FOR LEAVE TO AMEND

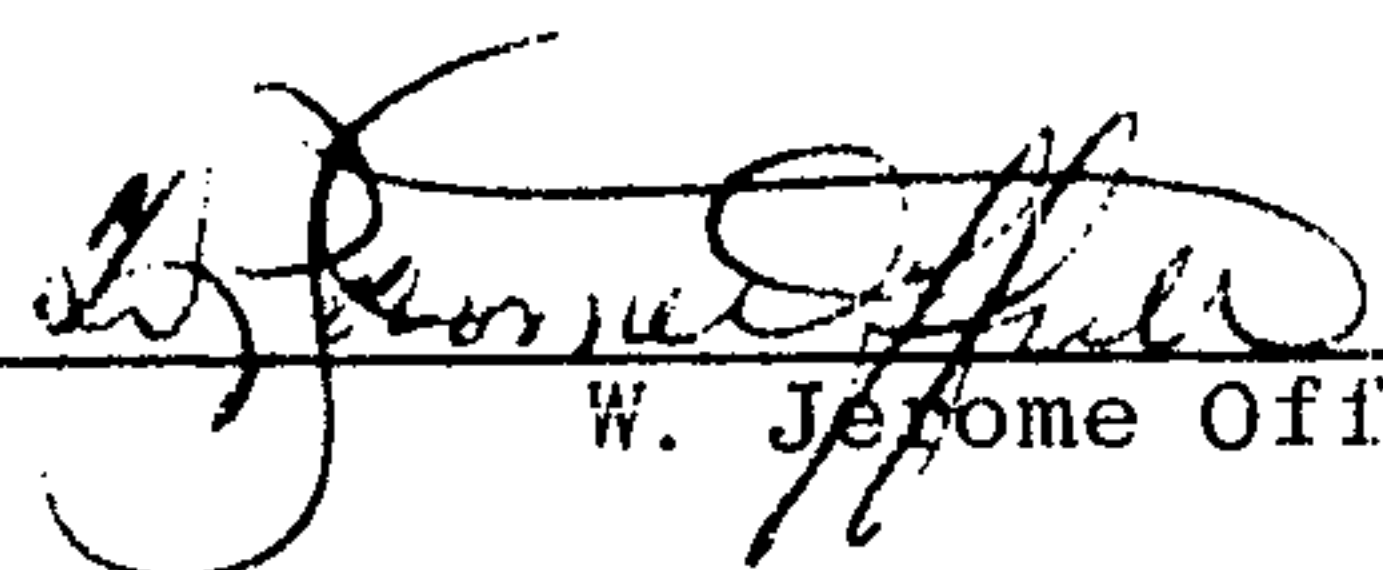
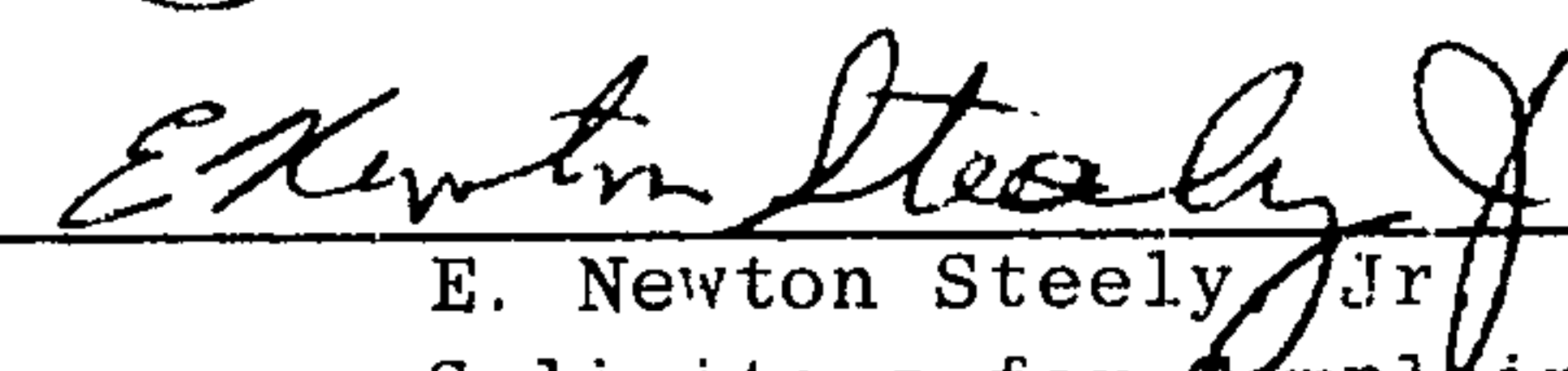
Jesse E. Wiles, Complainant in the above referenced cause, by W. Jerome Offutt and E. Newton Steely, Jr., his Solicitors, moves for Leave to Amend the Bill of Complaint heretofore filed in the above referenced cause on April 22, 1968 in the following manner;

1. That this Honorable Court grant leave to amend said Bill of Complaint by striking all of paragraph Second thereof, including the Exhibit attached thereto marked "Exhibit A."

2. That in lieu and in stead of said paragraph Second so stricken of said Bill of Complaint your Honorable Court permit your Complainant to substitute the following paragraph, including Exhibit;

That by Deed dated November 4, 1955, Josephine M. Eichelberger, widow, did grant and convey unto the Defendant, Ruth Elizabeth Wiles, and unto your Complainant, Jesse E. Wiles, who were then husband and wife, all that tract or parcel of land situate, lying and being in Woodsboro Election District, Frederick County, Maryland, and being all those tracts or parcels of land together with improvements thereon and with all the rights, ways, easements, privileges and appurtenances thereunto belonging or in anywise appertaining, and containing one 85/160 acres of land, more or less, which said Deed is recorded in Liber 553, folio 527, one of the Land Records of Frederick County, Maryland, a copy of said Deed being attached hereto and prayed to be taken as a part hereof, marked Amendment Exhibit A.

Respectfully submitted,


W. Jerome Offutt

E. Newton Steely, Jr.
Solicitors for Complainant

W. JEROME OFFUTT
ATTORNEY AT LAW
FREDERICK, MD.